

**United States Bankruptcy Court  
Northern District of Illinois  
Eastern Division**

In Re: Brandi McGhee	)	
	)	Chapter 13
Debtor	)	Judge Goldgar
	)	Case # 19-10742

To:

**By Mail,**

**U.S. Bank National Association, c/o U.S. Bank Home Mortgage, 4801 Frederica St., Owensboro, KY 42301**

**McCalla Raymer Leibert Pierece, c/o U.S. Bank National Association, LLC, 1 North Dearborn, Ste 1200, Chicago, IL 60611**

**U.S. Bank CEO Andrew Cecere, 800 Nicollet Mall, Minneapolis, MN 55402 (VIA CERTIFIED MAIL)**

**By Electronic Notice, Trustee Marilyn Marshall, court docs@chi13.com**

**US Trustee Patrick S Layng, USTPRegion11.es.ecf@usdoj.gov**

**NOTICE OF OBJECTION TO CLAIM #9**

Please take notice that on **July 9, 2019 at 9:30 a.m.** I shall bring the above motion for hearing before Judge Goldgar, or whomever is sitting in Judge Goldgar stead, at 219 S Dearborn, Courtroom 642, Chicago, IL 60604.

**Certification**

I certify that the motion and notice of motion were served by mail to the parties listed above by depositing copies in envelopes addressed to each party with proper postage in the United States mail on June 6, 2019 and by electronic notice through ECF at the above email addresses on June 6, 2019.

/s/ David Gallagher

One of Attorneys for Debtor  
Gleason and Gleason  
77 W Washington, Suite 1218  
Chicago, IL 60602  
Ph: (312) 578-9530  
Fax: (312) 578-9524

Label Matrix for local noticing  
0752-1

Case 19-10742  
Northern District of Illinois  
Eastern Division  
Thu Jun 6 15:37:36 CDT 2019

U.S. Bankruptcy Court  
Eastern Division  
219 S Dearborn  
7th Floor  
Chicago, IL 60604-1702

Arnold Scott Harris  
111 W. Jackson Ste 400  
Chicago, IL 60604-4135

Cardworks/CW Nexus  
Attn: Bankruptcy  
Po Box 9201  
Old Bethpage, NY 11804-9001

City Of Chicago Department of Finance  
C/O Arnold Scott Harris P.C.  
111 W Jackson Blvd Suite 600  
Chicago, IL 60604-3517

City of Chicago Corporation Counsel  
Attn: Edward Siskel  
30 N LaSalle St, Room 700  
Chicago, IL 60602-2503

ComEd Attn: Bkcy Dept  
1919 Swift Dr  
Oak Brook Terrace, IL 60523-1502

Hiskes Diller ODonnell  
for Village of South Holland  
16231 Wausau Ave  
South Holland, IL 60473-2157

LJ Ross  
PO Box 6099  
Jackson, MI 49204-6099

Midland Credit Management, Inc. as agent for  
Midland Funding LLC  
Po Box 2011  
Warren MI 48090-2011

PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

Ally Bank  
PO Box 130424  
Roseville, MN 55113-0004

Capital One  
Attn: General Correspondence/Bankruptcy  
Po Box 30285  
Salt Lake City, UT 84130-0285

Chase Auto Finance  
National Bankruptcy Dept  
201 N Central Ave Ms Az1-1191  
Phoenix, AZ 85004-1071

City of Chicago  
Attn: Mayor Rahm Emanuel  
121 N LaSalle, #507  
Chicago, IL 60602-1208

City of Chicago Dept of Law  
Attn: Charles King  
121 North LaSalle Street, Suite 600  
Chicago, IL 60602-1244

Commonwealth Edison Company  
Bankruptcy Department  
1919 Swift Drive  
Oak Brook, IL 60523-1502

Illinois Dept of Employment Security  
Bankruptcy Unit Collection Subdivis  
33 S State St 10th Floor  
Chicago, IL 60603-2804

MCSI Inc  
7330 College Drive #108  
Palos Heights, IL 60463-1186

Municipal Collection Services  
PO Box 327  
Palos Heights, IL 60463-0327

U.S. BANK NATIONAL ASSOCIATION  
14841 Dallas Pkwy Suite 425  
Dallas, TX 75254-8067

Ally Financial  
Attn: Bankruptcy  
Po Box 380901  
Bloomington, MN 55438-0901

Capital One Bank (USA), N.A.  
4515 N Santa Fe Ave  
Oklahoma City, OK 73118-7901

Citibank North America  
Citicorp Credit Svcs/Centralized Bankrup  
Po Box 790040  
Saint Louis, MO 63179-0040

City of Chicago - Dept of Finance  
Administrative Hearings  
121 N LaSalle St 107A  
Chicago, IL 60602-1232

Codilis and Assoc.  
15W030 N. Frontage Road  
Burr Ridge, IL 60527-6921

Franciscan St James Health  
2434 Interstate Plaza Dr, Ste 2  
Hammond, IN 46324-2947

Illinois Housing Development Auth  
Legal Dept  
401 N Michigan, Ste 700  
Chicago, IL 60611-4278

MERRICK BANK  
Resurgent Capital Services  
PO Box 10368  
Greenville, SC 29603-0368

Nicor Gas  
Attention: Bankruptcy Department  
PO Box 549  
Aurora, IL 60507-0549

Nicor Gas Co.  
1844 Ferry Road  
Naperville, IL 60563-9600

Professional Account Management  
PO Box 2080  
Milwaukee, WI 53201-2080

Secretary of State  
Attn: Safety & Financial Resp  
2701 S Dirksen Pkwy  
Springfield, IL 62723-0002

Synchrony Bank  
Attn: Bankruptcy  
Po Box 965060  
Orlando, FL 32896-5060

Synchrony Bank  
c/o PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

Synchrony Bank/ JC Penney  
Attn: Bankruptcy  
Po Box 965060  
Orlando, FL 32896-5060

Synchrony Bank/Walmart  
Attn: Bankruptcy  
Po Box 965060  
Orlando, FL 32896-5060

(p)US BANK  
PO BOX 5229  
CINCINNATI OH 45201-5229

United States Department of Education  
Claims Filing Unit  
PO Box 8973  
Madison, WI 53708-8973

Us Bank Home Mortgage  
Attn: Bankruptcy Department  
Po Box 5229  
Cincinnati, OH 45201-5229

Us Dept Of Ed/Great Lakes Higher Educati  
Attn: Bankruptcy  
2401 International Lane  
Madison, WI 53704-3121

Village of Dolton  
Municipal Officers - Tickets  
14014 Park Ave  
Dolton, IL 60419-1029

Village of Matteson  
20500 S Cicero  
Matteson, IL 60443-1646

Village of South Holland  
16226 Wausau Avenue  
South Holland, IL 60473-2156

Brandi McGhee  
17201 Bennett Ave  
South Holland, IL 60473-3624

Julie M Gleason  
Gleason & Gleason LLC  
77 W Washington Suite 1218  
Chicago, IL 60602-3246

Marilyn O Marshall  
224 South Michigan Ste 800  
Chicago, IL 60604-2503

Patrick S Layng  
Office of the U.S. Trustee, Region 11  
219 S Dearborn St  
Room 873  
Chicago, IL 60604-2027

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

U.S. Bank National Association  
c/o U.S. Bank Home Mortgage,  
a division of U.S. Bank N.A.  
4801 Frederica Street  
Owensboro, Kentucky 42301

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)U.S. Bank National Association

End of Label Matrix  
Mailable recipients 47  
Bypassed recipients 1  
Total 48

**United States Bankruptcy Court  
Northern District of Illinois  
Eastern Division**

In Re: Brandi McGhee	)	
	)	Chapter 13
Debtor	)	Judge Goldgar
	)	Case # 19-10742

**OBJECTION TO PROOF OF CLAIM #9-1**

Now comes Counsel for Brandi McGhee David Gallagher of Gleason and Gleason, and respectfully states:

1. That the Debtor filed the above captioned case under section 13 of the Bankruptcy Code on April 12, 2019.
2. That the Debtor's Plan has not yet been confirmed.
3. On May 30, 2019, U.S Bank National Association, c/o U.S. Bank Home Mortgage, (herein referred to as US BANK) filed a proof of claim that assessed a \$44,501.60 in pre-petition arrears (See Exhibit A).
4. The Debtor's residence has been property-tax exempt by the State of Illinois since 2016 (See Exhibit B).
5. Debtor's exemption has continued up until the present time (See Exhibit C).
6. That, accordingly, Claim #9-1 should be reduced by \$12,560.20, which is the amount of property taxes the mortgage company has paid since 2017.

WHEREFORE, Debtor respectfully requests that this Court enter an order sustaining Debtor's objection to Claim 9-1 filed by the U.S Bank and by reducing the arrearage claim to \$31,941.40 and any further relief that the court deems just and proper.

Respectfully Submitted,

/s/ David Gallagher #6295024  
One of Attorneys for Debtor

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77 W. Washington, Suite 1218  
Chicago, IL 60602  
Ph (312) 578-9530  
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